

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THOMAS BULL, an Individual,

Plaintiff,

-against-

ALEX MASHINSKY, an Individual;  
KRISTINE MASHINSKY, an  
Individual; and DOES 1 through 25,  
Inclusive,

Defendants.

Case No. 1:23-cv-01327-JGK

**STIPULATION AND ~~PROPOSED~~**  
**ORDER SETTING TIME TO**  
**ANSWER OR RESPOND TO**  
**COMPLAINT AND SETTING**  
**BRIEFING SCHEDULE**

**WHEREAS**, Plaintiff Thomas Bull (“Plaintiff”) filed a complaint in the above-captioned action on February 16, 2023 (Dkt. No. 1) (“Complaint”);

**WHEREAS**, Plaintiff asserts that service of process on Defendants Alex Mashinsky and Kristine Meehan (“Defendants”), was effective on February 21, 2023;

**WHEREAS**, Defendants dispute that they have been properly served with process;

**WHEREAS**, the parties have conferred and agreed to a deadline for Defendants to answer or otherwise respond to the Complaint and on a briefing schedule on any motion to dismiss the Complaint;

**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned attorneys for Plaintiff and Defendants, subject to the approval of the Court, as follows:

1. Defendants agree to accept service of the Complaint.
2. Defendants shall answer, move against, or otherwise respond to the Complaint by May 5, 2023.
3. In the event Defendants make a motion directed to the Complaint, Plaintiff’s opposition to Defendant’s Motion shall be due on or before July 7, 2023, and Defendant’s reply shall be due on or before August 7, 2023.

4. Defendants preserve all defenses, including defenses based upon venue or personal jurisdiction, and nothing herein shall be construed as waiving such defenses, and Plaintiff preserves the right to challenge such defenses, and nothing herein shall be construed as waiving such right.

5. This Stipulation may be executed by PDF, facsimile or other electronic signatures with the same force and effect as originals.

SO STIPULATED AND AGREED.

Dated: March 15, 2023

**DOGRA LAW GROUP PC**

By: /s/ Shalini Dogra  
Shalini Dogra  
2219 Main Street, Unit 239  
Santa Monica, CA 90405  
(747) 234-6673  
  
*Attorneys for Plaintiff*

**YANKWITT LLP**

By: /s/ Russell M. Yankwitt  
Russell M. Yankwitt  
Benjamin R. Allee  
Jonathan Ohring  
Cassandra M. Vogel  
140 Grand Street, Suite 705  
White Plains, NY 10601  
(914) 686-1500

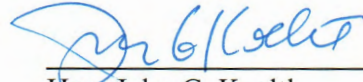
*Attorneys for Defendant Alex Mashinsky*

**KING & SPALDING LLP**

By: /s/ Leigh Nathanson  
Leigh Nathanson  
1185 Avenue of the Americas, 34th Fl.  
New York, NY 10036  
(212) 790-5359

*Attorneys for Defendant Kristine Meehan*

SO ORDERED:



Hon. John G. Koeltl  
United States District Judge

3/16/23